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Attorney for Plaintiff QuickLogic Corporation.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

QUICKLOGIC CORPORATION,

Plaintiff and Counter-Defendant,

v.

KONDA TECHNOLOGIES, INC. AND
VENKAT KONDA,

Defendants and Counter-Plaintiffs.

Case No. 5:21-cv-04657-EJD

**DECLARATION OF SARAH GUSKE IN
SUPPORT OF QUICKLOGIC CORP.'S
MOTION FOR ATTORNEYS' FEES**

Judge: Hon. Edward J. Davila

Date: October 5, 2023

Time: 9:00 a.m.

Courtroom: 4 – 5th Floor

1 I, Sarah Guske, declare as follows:

2 1. I am an attorney with the law firm of Baker Botts L.L.P., counsel for Plaintiff
3 QuickLogic Corp. (“QuickLogic”) in the above-captioned matter. I have personal knowledge of the
4 facts stated herein and if called as a witness, I could and would testify thereto.

5 1. Counsel for QuickLogic met and conferred with counsel for Konda Technologies.,
6 Inc. and Venkat Konda (“Defendants”) on August 25, 2023, for the purpose of attempting to resolve
7 any disputes with respect to QuickLogic’s motion for attorneys’ fees. A true and correct copy of
8 meet-and-confer correspondence between counsel for QuickLogic and counsel for Defendants from
9 August 14, 2023 to August 25, 2023 is attached as **Exhibit A**.

10 2. I have reviewed invoices that QuickLogic’s counsel submitted to QuickLogic in this
11 matter. Baker Botts maintains digital copies of these invoices and they were submitted to
12 QuickLogic on a monthly basis (subject to some variations between invoices). Baker Botts
13 maintained billing records for this matter in accordance with its usual practices, and attorneys
14 working on this matter were instructed to enter their time in accordance with firm policies. Baker
15 Botts conducts thorough reviews of each invoice before sending it to QuickLogic to confirm that
16 each entry reflects time appropriately charged to QuickLogic. In instances where an entry reflects
17 time that should not be charged to the client—whether due to a special client arrangement,
18 inefficiencies, or otherwise—the entry is removed from the invoice and is not billed to the client.
19 In the end, each invoice is reviewed by a team of individuals, including attorneys, litigation support
20 staff, and accounting support staff.

21 3. From my review of the aforementioned invoices, it is my good-faith calculation that,
22 since May 3, 2021, QuickLogic’s attorneys and legal professionals at Baker Botts have spent a total
23 of approximately 608.9 hours on this case, for a total of \$471,382.18 up to July 31, 2023. This total
24 includes time spent responding to Defendants’ pre-suit allegations and drafting QuickLogic’s
25 Complaint and litigating the various motions filed by QuickLogic and Defendants in this case. Since
26 June 17, 2021 (the day after QuickLogic filed its Complaint), QuickLogic’s attorneys and legal
27 professionals at Baker Botts spent a total of approximately 539.6 hours on this case, for a total of
28 \$402,581.86 in fees up to July 31, 2023. This total includes time spent on litigating the various

1 motions filed by QuickLogic and Defendants in this case. Approximately 518.3 hours and
2 \$389,906.57 in fees were incurred from August 25, 2021 (the date Defendants filed their first motion
3 to dismiss) through July 31, 2023. These totals do not include time spent after July 31, 2023,
4 including but not limited to the hours spent pursuing QuickLogic's motion for attorneys' fees.

5 4. The invoices identify seven attorneys who have worked on this case: Partner G.
6 Hopkins Guy, III, myself (Partner Sarah Guske), former Partner John V. Swenson, Special Counsel
7 John F. Gaustad, Associate Nick Baniel, Associate Bradley Shigezawa, and former Associate Daniel
8 Weiss. The invoices also identify two other legal professionals who have worked on this case: Senior
9 Paralegal Marco Giguere, and Senior Paralegal Larissa Soboleva. The following paragraphs provide
10 my good-faith calculations of the approximate hours worked by these individuals on this case.

11 5. Partner G. Hopkins Guy, III billed approximately 68.0 hours from May 3, 2021
12 through July 31, 2023. Mr. Guy's charged hourly rate ranged from \$1,232.50 to \$1,436.50 per hour.
13 A true and correct copy of Mr. Guy's biography from Baker Botts' website
14 (<https://www.bakerbotts.com/people/g/guy-g-hopkins>) is attached as **Exhibit B**.

15 6. I (Partner Sarah Guske) billed approximately 61.8 hours from May 3, 2021 through
16 July 31, 2023. My charged hourly rate ranged between \$1,032.75 to \$1,109.25 per hour. A true and
17 correct copy of my biography from Baker Botts' website
18 (<https://www.bakerbotts.com/people/g/guske-sarah>) is attached as **Exhibit C**.

19 7. Former partner Jon V. Swenson billed approximately 107.3 hours from May 3, 2021
20 through July 31, 2023. Mr. Swenson's charged hourly rate ranged from \$952.00 to \$1,015.75 per
21 hour. A true and correct copy of a historical version of Mr. Swenson's biography from Baker Botts'
22 website retrieved from the Internet Archive's Wayback Machine
23 ([https://web.archive.org/web/20210726052606/http://www.bakerbotts.com:80/people/s/swenson-](https://web.archive.org/web/20210726052606/http://www.bakerbotts.com:80/people/s/swenson-jon-v#0)
24 [jon-v#0](https://web.archive.org/web/20210726052606/http://www.bakerbotts.com:80/people/s/swenson-jon-v#0)) is attached as **Exhibit D**.

25 8. Special Counsel John F. Gaustad billed approximately 242.4 hours from May 3, 2021
26 through July 31, 2023. Mr. Gaustad's charged hourly rate ranged from \$918.00 to \$986.00 per hour.
27 A true and correct copy of Mr. Gaustad's biography from Baker Botts' website
28 (<https://www.bakerbotts.com/people/g/gaustad-john#0>) is attached as **Exhibit E**.

9. Associate Nick Baniel billed approximately 8.0 hours from May 3, 2021 through July 31, 2023. Mr. Baniel's charged hourly rate was \$573.75 per hour. A true and correct copy of Mr. Baniel's biography from Baker Botts' website (<https://www.bakerbotts.com/people/b/baniel-nick#0>) is attached as **Exhibit F**.

10. Associate Bradley Shigezawa billed approximately 7.1 hours from May 3, 2021 through July 31, 2023. Mr. Shigezawa's charged hourly rate was \$607.75 per hour. A true and correct copy of Mr. Shigezawa's biography from Baker Botts' website (<https://www.bakerbotts.com/people/s/shigezawa-bradley>) is attached as **Exhibit G**.

11. Former associate Daniel Weiss billed approximately 81.3 hours from May 3, 2021 through July 31, 2023. Mr. Weiss's charged hourly rate was \$463.25 per hour.

12. Senior Paralegal Marco Giguere billed approximately 17.3 hours from May 3, 2021 through July 31, 2023. Mr. Giguere's charged hourly rate ranged from \$331.50 to \$369.75 per hour.

13. Senior Paralegal Larissa Soboleva billed approximately 15.1 hours from May 3, 2021 through July 31, 2023. Ms. Soboleva's charged hourly rate was \$348.50 per hour.

14. Attached as **Exhibit H** are excerpts from the September 2019 edition of the American Intellectual Property Law Association (the “AIPLA”) Report of the Economic Survey (“AIPLA Report”), retrieved via PacerPro from Docket No. 127-16 in *RideApp, Inc. v. Lyft, Inc.*, No. 4:18-cv-07152-JST (N.D. Cal.).

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on August 25, 2023 in Ross, California.

By: /s/ Sarah Guske
Sarah Guske